

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., MG  
PREMIUM LTD, MG FREESITES LTD,  
WEBGROUP CZECH REPUBLIC, A.S.,  
NKL ASSOCIATES, S.R.O., SONESTA  
TECHNOLOGIES, S.R.O., SONESTA  
MEDIA, S.R.O., YELLOW PRODUCTION  
S.R.O., PAPER STREET MEDIA, LLC,  
NEPTUNE MEDIA, LLC, JANE DOE,  
MEDIAME SRL, MIDUS HOLDINGS, INC.,

Plaintiffs,

vs.

ANGELA COLMENERO, IN HER  
OFFICIAL CAPACITY AS INTERIM  
ATTORNEY GENERAL FOR THE STATE  
OF TEXAS,

Defendant.

Case No.: 1:23-cv-917

**DECLARATION OF SADIQ MUHAMED IN SUPPORT OF PLAINTIFFS' MOTION  
FOR EXPEDITED PRELIMINARY INJUNCTION**

I, Sadiq Muhamed, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of the Act of June 12, 2023, Ch. 676, § 2 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

**PAPER STREET MEDIA, LLC**

2. I hold the position of CEO at Paper Street Media, LLC (“Paper Street”), a limited liability company organized under the laws of Florida, that both operates a collection of adult websites comprising the TeamSkeet network and holds the intellectual property rights to the content on TeamSkeet network sites.

3. The TeamSkeet network is made up of numerous adult websites, all of which are available on a subscription-only basis, where adults can purchase a subscription to access to full length, high quality videos available on the websites. These websites are available to the entire world of internet users, setting aside age or country censorship filters, and are available in almost all countries. For shoots with adult performers, Paper Street writes the scripts, hires the production team, and does the pre- and post-production work. Paper Street also makes some of the content available on the TeamSkeet network available to other adult websites, including Pornhub.com, xvideos.com, xnxx.com, and SpiceVids.com.

4. Paper Street strongly disagrees with the statements that the Act would require it to make on its websites and advertisements:

TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function. TEXAS HEALTH AND HUMAN SERVICES WARNING: Exposure to this content is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses. TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography increases the demand for prostitution, child exploitation, and child pornography.

5. Advertisement assets are typically designed using a 300x250 pixel frame, where short video clip (10-20 sec) or static graphic banner ads are used. Adding the above-quoted text to the advertisements would be impracticable and dwarf the websites' ads themselves.

6. Paper Street also strongly disagrees with the Act's requirement to post the following message at the bottom of every webpage:

U.S. SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES  
ADMINISTRATION HELPLINE: 1-800-662-HELP (4357) THIS HELPLINE IS  
A FREE, CONFIDENTIAL INFORMATION SERVICE (IN ENGLISH OR  
SPANISH) OPEN 24 HOURS PER DAY, FOR INDIVIDUALS AND FAMILY  
MEMBERS FACING MENTAL HEALTH OR SUBSTANCE USE  
DISORDERS. THE SERVICE PROVIDES REFERRAL TO LOCAL  
TREATMENT FACILITIES, SUPPORT GROUPS, AND COMMUNITY-  
BASED ORGANIZATIONS.

7. Paper Street's websites cooperate with parental filtering software by including a meta tag in their coding that designates their content as "RTA" (Restricted to Adults). By including this meta tag, parental control filters can easily identify Paper Street's websites as adult content sites and block access.

8. The Terms and Conditions for Paper Street's websites make clear that individuals under the age of eighteen are not authorized to access the websites.

#### **NEPTUNE MEDIA, LLC**

9. I hold the position of CEO at Neptune Media, LLC ("Neptune Media"), a limited liability company organized under the laws of Florida, that operates a collection of adult content comprising the MYLF network and holds the intellectual property rights to the content on MYLF network sites.

10. The MYLF network is made up of numerous adult websites, all of which are available on a subscription-only basis, where adults can purchase a subscription to access to full length, high quality videos available on the websites. These websites are available to the entire world of internet users, setting aside age or country censorship filters, and are available in almost all countries. For shoots with adult performers, Neptune Media writes the scripts, hires the production team, and does the pre- and post-production work. Neptune Media also makes some

of the content available on the MYLF network available to other adult websites, including Pornhub.com, xvideos.com, xnxx.com, and SpiceVids.com.

11. Neptune Media strongly disagrees with the statements that the Act would require it to make on its websites and advertisements:

TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function. TEXAS HEALTH AND HUMAN SERVICES WARNING: Exposure to this content is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses. TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography increases the demand for prostitution, child exploitation, and child pornography.

12. Advertisement assets are designed using a 300x250 pixel frame, where short video clip (10-20 sec) or static graphic banner ads are used. Adding the above-quoted text to the advertisements would be impracticable and dwarf the websites' ads themselves.

13. Neptune Media also strongly disagree with the Act's requirement to post the following message at the bottom of every webpage:

U.S. SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES ADMINISTRATION HELPLINE: 1-800-662-HELP (4357) THIS HELPLINE IS A FREE, CONFIDENTIAL INFORMATION SERVICE (IN ENGLISH OR SPANISH) OPEN 24 HOURS PER DAY, FOR INDIVIDUALS AND FAMILY MEMBERS FACING MENTAL HEALTH OR SUBSTANCE USE DISORDERS. THE SERVICE PROVIDES REFERRAL TO LOCAL TREATMENT FACILITIES, SUPPORT GROUPS, AND COMMUNITY-BASED ORGANIZATIONS.

14. Neptune Media's websites cooperate with parental filtering software by including a meta tag in their coding that designates their content as "RTA" (Restricted to Adults). By including this meta tag, parental control filters can easily identify these sites as adult content sites and block access.

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15. The Terms and Conditions for Neptune Media's websites make clear that individuals under the age of eighteen are not authorized to access the websites.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 2, 2023 in Miami, Florida

Dated: August 2, 2023

/s/ Sadiq Muhamed  
Sadiq Muhamed